

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED FEE PAID: 6/386
RECEIPT # 50.00
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BY DPTY CLERK
DATE 1/12/05 JH

WILLIAM FOLEY,

Plaintiff,

V.

ALCATEL USA, INC.,

Defendant.

Civil Action No. 04-1216 EFH

MOTION FOR ADMISSION PRO HAC VICE OF SHARAN GOOLSBY

Pursuant to Local Rule 83.5.3, the undersigned counsel hereby moves that Sharan Goolsby of Alcatel USA, Inc., 3400 W. Plano Parkway, Mailstop 009, Plano, TX 75075, be admitted to appear on behalf of defendant Alcatel USA, Inc., and to practice before this Court in the above-entitled action. As grounds for this motion, the undersigned counsel respectfully represents the following:

1. Ms. Goolsby is and has been a member in good standing of the bar of the State of Texas since 1995;
2. Ms. Goolsby is and has been a member in good standing of the bars of the following United States District Courts, and Circuit Courts of Appeals since the following dates:

November 3, 1998	Texas, Northern District of Texas
May 23, 2000	Texas, Eastern District of Texas
June 12, 2002	Colorado, District of Colorado
February 6, 2003	Oklahoma, Northern District of Oklahoma

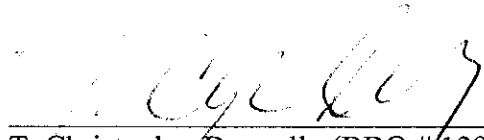
3. There are no disciplinary proceedings pending against Ms. Goolsby as a member of the bar in any jurisdiction;

4. Ms. Goolsby has represented to the undersigned counsel that she is familiar with the Local Rules of the United States District Court for the District of Massachusetts; and

5. In further support of this motion, Ms. Goolsby has submitted herewith her Certificate of Good Standing as required by Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully moves Ms. Goolsby's admission to practice before this Court *pro hac vice*.

Respectfully submitted,



T. Christopher Donnelly (BBO #129930)
DONNELLY, CONROY & GELHAAR, LLP
One Beacon Street, 33d Floor
Boston, MA 02108
(617) 720-2880

Dated: January 6, 2005

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the above document was served upon the attorney of record for each party by mail/by hand

Date: 70 GUL 1/7/05

CERTIFICATE OF GOOD STANDING

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, I, Sharan Goolsby, Esq., hereby certify that: (1) I am admitted to the bars of the Courts set forth in the foregoing motion; (2) I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice; (3) No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction; and (4) I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Respectfully submitted,



Sharan Leslie Goolsby, Esq.

Dated: January 6, 2005